

March 18, 2020

**Via ECF**

Honorable Paul G. Gardephe  
United States District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**Re: United States v. Avenatti, No. S1 19 Cr. 373 (PGG)**  
**Unopposed Motion for One (1) Additional Business**  
**Day to File Post-Trial Motions**

Dear Judge Gardephe:

I write to respectfully request an enlargement of time, until March 23, 2020, to file post-trial motions in this case. The government does not oppose this request.

On February 14, 2020, a jury convicted Mr. Avenatti. The Court set a deadline of March 16, 2020, to file post-trial motions. Sentencing is scheduled for June 17, 2020, approximately three months away.

The Court previously extended the deadline to this Friday, March 20, 2020, to file post-trial motions. Over the past two weeks, undersigned counsel has had to address various legal matters, involving other clients, that have arisen as a result of the pandemic affecting the entire country, which has made it particularly difficult to finalize the consolidated post-trial motions due this Friday. Accordingly, undersigned counsel requests the court's indulgence to allow Mr. Avenatti one additional business day, until Monday, March 23, 2020, to file the post-trial motions.

The government does not oppose an extension until March 23, 2020, so long as the government's deadline for filing its response is similarly extended (until April 13, 2020). Mr. Avenatti's reply would then be due April 20, 2020. Thank you for your consideration of this request.

Respectfully Submitted,  
/s Scott Srebnick  
Scott A. Srebnick